

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

In re:

LeClairRyan, PLLC,¹

Debtor

Case No.

19-34574-KRH

Chapter

7

NOTICE OF MOTION AND HEARING THEREON

PLEASE TAKE NOTICE Lynn L. Tavenner, Trustee, and not individually but solely in her capacity as the Chapter 7 trustee of the bankruptcy estate of LeClairRyan PLLC, in the above-referenced Chapter 7 case (the “**Case**”), by counsel, filed her *Motion for Entry of Orders Further Extending the Chapter 7 Trustee’s Time to Assume, Reject, and/or Assign Certain Executory Contracts and/or Leases of Personal Property Pursuant to 11 U.S.C. § 365(d)(1)* (the “**Motion**”), ECF No. 262. Copies of the Motion and the *Second Ex Parte Bridge Order Further Extending the Time to Assume, Reject, and/or Assign Certain Executory Contracts and/or Leases of Personal Property Pursuant to 11 U.S.C. § 365(d)(1)* (the “**Bridge Order**”), ECF No. 274, are being served herewith.

PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read the Motion and Bridge Order carefully and discuss them with your attorney, if you have one in this chapter 11 Case. (If you do not have an attorney, you may wish to consult one).

PLEASE TAKE FURTHER NOTICE on September 4, 2019, the Court entered the *Order Establishing Certain Notice, Case Management and Administrative Procedures* [ECF. No. 38] (the “**Case Management Order**”), which approved the Notice, Case Management, and Administrative Procedures attached as Exhibit 1 to the Case Management Order (the “**Case Management Procedures**”). The Case Management Procedures, among other things, prescribe the manner in which Objections must be filed and served and set forth when certain hearings will be conducted. A copy of the Case Management Order may be obtained, free of charge, by written

¹ The principal address of the Debtor as of the petition date was 4405 Cox Road, Glen Allen, Virginia 23060, and the last four digits of the Debtor’s federal tax identification number are 2451.

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Counsel for Lynn L. Tavenner, Chapter 7 Trustee

to request to dtabakin@tb-lawfirm.com or, for a fee, at <https://ecf.vaeb.uscourts.gov>.

PLEASE TAKE FURTHER NOTICE if you do not want the Court to grant the relief requested in the Motion or granted on an interim basis in the Bridge Order, or if you want the Court to consider your views on the Motion or Bridge Order, then, by **January 23, 2020** (the “**Objection Deadline**”), you or your attorney must:

File with the Court, either electronically or at the address shown below, a written response to the Motion and/or Bridge Order pursuant to Rule 9013-1(H) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia and the Case Management Procedures. If you mail your written response to the Court for filing, you must mail it early enough so the Court will **receive** it on or before the Objection Deadline.

If a response is not properly and timely filed and served, the Court may deem any opposition waived, treat the Motion and Bridge Order as conceded and enter an appropriate order granting the requested relief without further notice or hearing.

Clerk of the Court
United States Bankruptcy Court
701 East Broad Street, Suite 4000
Richmond, VA 23219

In accordance with the Case Management Procedures, you must also serve a copy of your written Objection on the Core Parties, the 2002 List Parties and any Affected Entity so that the Objection is received on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE THAT the Court will entertain the Motion and the Bridge Order on January 30, 2020, at 11:00 a.m. (or such time thereafter as the matter may be heard). In connection with the same, the undersigned will appear before The Honorable Kevin R. Huennekens, United States Bankruptcy Judge, in Room 5000, of the United States Courthouse, 701 E. Broad Street Richmond, Virginia 23219. Any party desiring to object or otherwise be heard with respect to the same shall also appear and be heard at such time.

PLEASE TAKE FURTHER NOTICE THAT you should consult the Case Management Procedures before filing any written response.

PLEASE GOVERN YOURSELVES ACCORDINGLY.

Respectfully submitted,

LYNN L. TAVENNER, CHAPTER 7 TRUSTEE

Dated: December 9, 2019
Richmond, Virginia

By: /s/ David N. Tabakin
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CERTIFICATE OF SERVICE

Pursuant to the Local Rules of this Court, I certify that on this 9th day of December 2019, a true copy of the foregoing Motion was sent electronically and/or by first-class mail to: (a) the Office of the United States Trustee; (b) all parties listed on the Debtor's Official Form 106G except known landlords whose leases have already been rejected by Order of this Court; (c) the Debtor's 20 Largest Unsecured Creditors; (d) all known secured creditors from the Debtor's Official Form 106D; (e) the Core Parties and 2002 List as defined in the Case Management Order; and (f) all parties requesting service of pleadings in this Case (as indicated on the Schedule A attached to the Court filed copy of this Notice).

/s/ David N. Tabakin
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